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December 20, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**VIA HAND DELIVERY**

Magalie Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street Lobby, Room TW-A325  
Washington, D.C. 20554

Re: In the Matter of Toll Free Service Access Codes; Petitions for  
Emergency Relief Regarding Release of the 855 Toll Free Code,  
CC Docket No. 95-155

Dear Ms. Salas:

Enclosed for filing please find an original and four copies of Reply Comments of the Bell Operating Companies and DSMI in the above-referenced matter.

Please date stamp one of the copies and return it to the messenger in the enclosed envelope.

Thank you for your assistance in this matter.

Very truly yours,



Aaron M. Panner

Enclosures

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List A B C D E

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Toll Free Service Access Codes

Petitions for Emergency Relief Regarding  
Release of the 855 Toll Free Code

CC-Desk No. 95-155  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**REPLY COMMENTS OF THE BELL OPERATING COMPANIES AND DSMI**

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**INTRODUCTION**

The Bell Operating Companies (the “BOCs”) and Database Service Management, Inc. (“DSMI”)<sup>1</sup> hereby reply to comments filed by the Toll Free Number Coalition (“TFNC”) and The Toll Free Commerce Coalition (“TTFCC”). The TFNC and TTFCC (collectively, “the Coalitions”) seek an indefinite delay in the roll out of the 855 code. In support of this request, the Coalitions raise many of the same issues presented in their eleventh-hour petitions to defer the release of the 855 toll free service code. As the SMS/800 Management Team (the “SMT”) and DSMI explained on November 16, 2000, in response to those petitions, the Coalitions’ complaints are based on factual misstatements: they continue to ignore or misrepresent recent changes in the number reservation system implemented by DSMI and approved by industry consensus that are designed to ensure that the few documented problems with the 866 roll out

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<sup>1</sup> As described in the Commission’s Fifth Report and Order, *Toll Free Service Access Codes*, 15 FCC Rcd 11939 (2000) (“*Fifth Report and Order*”), the BOCs jointly provide for access to the SMS/800 database through a tariff. *Id.* at 11941-42, ¶ 3. DSMI serves as the BOCs’ business representative for purposes of provision of SMS/800 service. *Id.*

will not recur. The Coalitions further suggest that the SMS/800 Number Administration Committee (“SNAC”) — an industry committee comprising large and small Resp Orgs<sup>2</sup> — is not being run pursuant to OBF procedures. This claim is baseless, and the Coalitions’ members have not even attempted to raise their concerns within the SNAC process, despite numerous opportunities to do so. Because the reservation system is fully compliant with the Commission’s requirement that toll-free number reservations be made available on a “first-come, first-served” basis, the Commission should permit the introduction of the 855 service code to proceed.

### **BACKGROUND**

On November 9 and November 14, the Coalitions filed petitions for emergency relief before the Commission, seeking to delay the roll out of the 855 service code, which was scheduled for November 18.<sup>3</sup> The Coalitions claimed that the reservation system discriminated against their members, which use a web-based graphical user interface (“GUI”) and a dial-up interface to send number requests, in favor of larger organizations that use an application-to-application interface, Mechanized Generic Interface (“MGI”). The SMT and DSMI filed a response on November 16, explaining that the Coalitions’ concerns either had been addressed to the satisfaction of the industry or were unfounded. As a result of system changes implemented

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<sup>2</sup> Although the BOCs administer the national toll free number database systems, the “*industry as a whole*, through the Alliance for Telecommunications Industry Solutions (ATIS) determines implementation of new toll free codes.” *Fifth Report and Order*, 15 FCC Rcd at 11949, ¶ 25 (emphasis added). SNAC is a standing committee of the Ordering and Billing Forum (“OBF”), which is part of the Carrier Liaison Committee within ATIS, and is responsible for toll free numbering issues.

<sup>3</sup> One of the Coalitions, TTFCC, also sought two other forms of relief: setting aside nearly 150,000 vanity numbers from the initial release and preventing the use of one of the number reservation interfaces, MGI, for the first six hours of the 855 release. TTFCC does not raise these claims in its comments, suggesting that it no longer seeks these remedies which are, as we explained in our earlier comments, contrary to the Commission’s conclusions in the *Fourth Report and Order* and which amount to untimely petitions for reconsideration of that

after introduction of the 866 code, the three interfaces now offer essentially equal access to SMS/800. *See* Declaration of Michael J. Wade ¶ 11 (“Wade Decl.”) (Tab 2 to SMT and DSMI Comments (Nov. 16, 2000)). Further, the primary cause of the ordering problems the Coalitions’ members experienced during the 866 roll out, the “response mode” feature of the GUI and dial-up interfaces, has been eliminated. *See id.* ¶¶ 6-7. Tests of the revised reservation software revealed that GUI and dial-up users experienced no difficulties in placing a continuous stream of orders during simulations of the first hour of a release. *See id.* ¶¶ 7-8. Finally, contrary to claims made by the Coalitions, volumes of orders placed over the MGI interface do not prevent orders submitted over the other two interfaces from also being processed in a first-come, first-served manner. *See id.* ¶ 12.<sup>4</sup>

Without commenting on the merits of the petitions, the Commission requested that DSMI delay the release of the 855 code pending review of the issues raised in the petitions for emergency relief.<sup>5</sup> The Commission then sought comment on those issues from interested parties.<sup>6</sup> While the Coalitions seek to delay the introduction of the 855 code for an indefinite period, WorldCom and Sprint, like the BOCs and DSMI, support prompt introduction of that code. As explained below, the Coalitions’ comments provide the Commission with no reason to

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order. *See* Fourth Report and Order and Memorandum Opinion and Order, *Toll Free Service Access Codes*, 13 FCC Rcd 9058, 9065, ¶ 13, 9069, ¶ 25 (1998); 47 C.F.R. § 1.429(d).

<sup>4</sup> Although large volumes of orders may delay the return of responses to reservation requests from SMS/800, those delays affect users of all three interfaces equally — MGI users do not receive responses any faster than users of the GUI or dial-up interfaces. *See* Wade Decl. ¶ 6. With the elimination of “response mode,” those delays have no affect on any user’s ability to submit orders.

<sup>5</sup> *See* Letter from L. Charles Keller, Chief, Network Services Division, Common Carrier Bureau, to Michael Wade, President, Database Service Management, Inc., Nov. 17, 2000.

<sup>6</sup> *See* Public Notice, *Comments Sought on Petitions for Emergency Relief Regarding Release of the 855 Toll Free Code*, DA 00-2688 (rel. Nov. 29, 2000).

doubt that numbers in the 855 code will be made available to all Responsible Organizations (“Resp Orgs”) on an equal basis, in a manner that complies fully with the Commission’s first-come, first-served mandate.

## **DISCUSSION**

The Coalitions’ requests for indefinite deferral of the roll out of the 855 toll free service code — based on anticipated problems with access to the reservation system by smaller users — reflect a series of factual inaccuracies. Rather than acknowledging the mistaken premises on which their emergency petitions were based, the Coalitions repeat many of their previous claims and add new misrepresentations of the factual record. Once their super-heated rhetoric is brushed aside, however, the Coalitions have two basic complaints. The first concern focuses on the MGI interface. In particular, the Coalitions claim that orders placed over MGI — not the now-eliminated “response mode” feature of the GUI and dial-up interfaces — caused their difficulties during the 866 roll out; they further claim that system testing has not shown that this alleged problem has been resolved. The Coalitions’ second concern is procedural: they argue that SNAC’s oversight of the SMS/800 does not provide small Resp Orgs with a fair opportunity to participate. As explained below, neither set of concerns has merit.

### **I. The Number Reservation System Complies Fully with the Commission’s First-Come, First-Served Mandate**

#### **A. The Coalitions Have Made No Showing that MGI Orders Interfere with GUI and Dial-Up Access to SMS/800**

The Coalitions’ complaints about the number reservation system are telling for what they do not challenge. The Coalitions do not contest that “response mode” previously caused the GUI and dial-up interfaces to wait for a response from SMS/800 before users were permitted to send further requests. Nor have they challenged the statement that the latest software release has eliminated “response mode,” thereby enabling Resp Orgs to send a continuous stream of orders

over the GUI and dial-up interfaces without awaiting a response from SMS/800.<sup>7</sup> Instead, the Coalitions claim *only* that the system tests conducted during September and October of this year were insufficient to demonstrate that MGI orders were *not* the cause of the problems they experienced during the 866 roll out. See TFNC Comments at 4-5; TTFCC Comments at ii, 2, 5-6.

Their insistence on blaming MGI orders for the problems they experienced during the 866 roll out is based on pure speculation. As explained below, and as was explained in our previous comments, the September test confirmed that “response mode” and not MGI orders caused the delays during the 866 roll out. When “response mode” was eliminated, and the systems were tested using MGI orders at “real-world” volumes, those problems did not recur. The Coalitions’ sole basis for challenging the adequacy of the number reservation system is false — the September and October tests demonstrate clearly that “response mode,” and *not* MGI orders, caused those problems.

**B. Extensive Testing Demonstrates that Current Interfaces Ensure First-Come, First-Served Service**

Following the 866 roll out, the SMS/800 Data Center and SMS/800 Help Desk organized and conducted a system test, on September 6, 2000, using the same software employed during the 866 roll out and involving Resp Orgs that complained of problems during that roll out. See Wade Decl. ¶ 5. That test was able to replicate those problems and to identify their source. See

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<sup>7</sup> The BOCs and DSMI do not agree with TTFCC that GUI and dial-up users “are locked out of the database for 25-30 minutes or more at the outset of a new code release.” TTFCC Comments at 4. Rather, the interfaces were designed to await a response before permitting the submission of further requests. That delay could be lengthy during periods in which SMS/800 processed a high volume of numbers. Users, however, were prevented from entering further requests by their interfaces, not by the database. Because this feature of those interfaces has been successfully eliminated, neither the interfaces nor the database will limit the number of requests a Resp Org can submit during the outset of a new code release.

*id.* ¶ 6.<sup>8</sup> Resp Orgs experienced the same “response mode” related problems — wherein the interface would not accept further requests until receiving a response from SMS/800 to the previous requests, which could take up to 20-25 minutes during the initial phase of a roll out of a new code — that arose during the 866 roll out. *See* 866 NPA Code Opening: Problem Analysis at 1-2 (Attach. 1 hereto).<sup>9</sup> Resp Orgs that participated in the test were then invited to a conference call, on October 4, 2000, to discuss the findings from that system test. *See id.* at 2; Wade Decl. ¶ 5.

TTFCC states that its members did not receive advance notification of the October 4 conference call. *See* TTFCC Comments at 9-10. Not so: nine of the fourteen Resp Orgs that submitted letters in support of the Coalitions’ comments were invited to participate in the September system test because they were among those that had complained about the 866 roll out. *See* Declaration of Joseph P. Casey ¶ 2 (“Casey Decl.”) (Attach. 2 hereto). Not a single one of these nine Resp Orgs chose to participate in that test *See id.* Another of those fourteen Resp Orgs was invited to participate in the October 4 call, but also chose not to do so. *See id.* ¶ 4; 866 NPA Code Opening: Problem Analysis at 3. According to SMS/800 records, the other four Resp Orgs that submitted letters in support of the Coalitions did not actually submit any number reservation requests during the 866 roll out, making the source of their complaints difficult to ascertain. *See* Casey Decl. ¶ 5.<sup>10</sup>

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<sup>8</sup> The entry on The Long Distance Partnership’s contact log that the September test “did not duplicate the jam” is simply incorrect. *See* TFNC Comments Attach. B at 2.

<sup>9</sup> The first two pages of this document were e-mailed to each Resp Org that was invited to participate in the October 4 conference call. *See* Casey Decl. ¶ 3.

<sup>10</sup> Further, TTFCC incorrectly suggests that the October 4 call was held under the auspices of SNAC and that the absence of that call from the SNAC record of meetings suggests either that the October 4 call never took place or that it took place in violation of OBF rules. *See* TTFCC Comments at 10. As we explained in our earlier comments in this proceeding, that meeting was organized and run by the SMS/800 Help Desk, not by SNAC (explaining its

In early October, a new version of the SMS/800 reservation software was installed in the SMS/800 tutorial system and in the testing system at the SMS/800 Dallas Data Center. *See* Wade Decl. ¶ 7. That version *eliminated response mode* and also implemented other changes that had been agreed to by SNAC prior to the roll out of the 866 code. SMS/800 also announced that the revised software would become generally available on November 4.<sup>11</sup>

On October 12 and October 17, the industry conducted tests of the enhanced system.<sup>12</sup> *See* Wade Decl. ¶ 7. During those tests, the problems experienced during the 866 roll out did not recur. *See id.* Users of the GUI and dial-up interfaces were able to generate a continuous stream of requests without having to wait for responses to earlier requests. The October 12 test involved a number of Resp Orgs using on-line access, as well as additional on-line usage from vendor groups and simulated GUI and MGI usage, including 65,000 simulated MGI orders. *See* Casey Decl. ¶ 7. A total of 100,000 numbers were reserved in the hour-long test, with no user experiencing any of the problems that had occurred during the 866 roll out. *See id.* The October

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absence from the SNAC record of meetings), and all Resp Orgs that participated in the September 6 test received e-mailed invitations to this call. *See* Wade Decl. ¶ 5.

<sup>11</sup> Although TTFCC states that this announcement violated the SMS/800 Tariff, which requires 60 days notice of certain system changes, *see* TTFCC Comments at 12, the changes implemented had been planned and agreed to by SNAC since May 8, 2000. *See* Letter from Ronald D. Havens, OBF Moderator, to L. Charles Keller, Chief, Network Services Division at 1 (June 5, 2000) (“Havens Letter”) (Tab 1 to SMT and DSMI Comments (Nov. 16, 2000)).

The new software, Release 11.2.3, was installed in the production SMS/800 environment on November 4. *See* Wade Decl. ¶ 9. Resp Orgs were not required to make any changes to their systems to take advantage of the modifications made in Release 11.2.3. *See id.* The BOCs and DSMI are unsure why the one company discussed by the TFNC did not receive its software until November 7, *see* TFNC Comments at 5 n.7, but note that the problems described had nothing to do with the operation of the interfaces, but rather with an upgrade to the virtual private network (“VPN”) software, *see id.* Attach. B at 3.

<sup>12</sup> The two October tests were announced well in advance of the test date, and Resp Orgs were given contact numbers to receive answers to their questions. *See* SMS-00-199 (Sept. 15, 2000), SMS-00-208 (Sept. 28, 2000) (Tabs 4 and 5 to SMT and DSMI Comments (Nov. 16, 2000)).



17 test, pursuant to industry agreement, involved only actual MGI and on-line users who chose to participate and included no simulated usage. *See id.* ¶ 8. During the hour-long test, the Resp Orgs that chose to participate reserved over 19,000 numbers and, again, the on-line users experienced no problems in submitting their orders. *See id.* In short, there is no truth to the Coalitions’ contentions that MGI usage was not part of the tests, that sufficient volumes were not tested, or that anything other than “response mode” was responsible for the problems they experienced during the 866 roll out.<sup>13</sup>

**C. All Three Interfaces Provide Non-Discriminatory Equal Access to SMS/800**

The Coalitions also claim that MGI users have discriminatory access to the number reservation system. This claim is flatly wrong. Users who submit a request for the same number at the same time have an equal chance of obtaining that number, no matter which interface they use. *See Wade Decl.* ¶ 13. As a result of the upgrades to the GUI and dial-up interfaces, the three interfaces now offer essentially equal capabilities. Users of each interface can submit search and reservation requests for up to ten numbers in a single transaction. *See id.* ¶ 10. None of the interfaces has a “response mode.” *See id.* ¶ 12. Finally, as the October tests demonstrated, MGI volumes do not affect receipt of GUI and dial-up requests; a single Reservation Queue processes all transactions, regardless of interface, in the exact order in which they are received — first-come, first-served. *See id.*

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<sup>13</sup> The Coalitions mischaracterize a comment during the November 3 SNAC meeting. *See TFNC Comments* at 4-5; *TTFCC Comments* at 5-6. As the minutes reflect, a question was asked if the tests replicated a situation in which “different online users” — not users of different interfaces, but rather different users of the same on-line interface — “requested the same 855 number at the same time.” *See TTFCC Comments Attach. B* at 1. Participants were informed that the software developer had tested such a scenario and found that such requests were handled on a first-come, first-served basis. *See id.*

MGI simply permits users to submit very large volumes of orders efficiently. Without MGI, these users would need to establish thousands of dial-up or GUI links to SMS/800 in order to process their number requests. For users who submit smaller volumes of orders, however, creation of an MGI interface would be a wasteful investment. For example, in its petition for emergency relief, the TFNC included an affidavit from one Resp Org stating that it employed nine personal computers and a 56 kbps dedicated line to submit its orders during the 866 roll out, which it could do at a fraction of the cost of MGI. *See* TFNC Petition for Emergency Relief and Expedited Action Attach. A at 1 (filed Nov. 9, 2000). Further, users of GUI and dial-up can employ scripts that will generate transactions as fast as a personal computer can process them. *See id.* (describing use of such scripts during the 866 roll out); *see also* Wade Decl. ¶ 11. Moreover, users of GUI and dial-up are able to establish as many simultaneous connections as they desire, thereby compensating for any speed advantage enjoyed by MGI users. *See* Wade Decl. ¶ 11.

TTFCC, however, contends that MGI offers superior access because it can send numbers in “almost unlimited” quantities, while GUI and dial-up are limited to 10 numbers per request. *See* TTFCC Comments at iii, 8. Contrary to TTFCC’s claim, users of MGI may submit 10 numbers per request, just like GUI and dial-up users. *See* Wade Decl. ¶ 10. There is no technological reason for the 10 number per request limit — it could be larger or smaller. *See* Casey Decl. ¶ 9. The number was set at 10 by consensus within SNAC; any effort to change that number should also be initiated through SNAC. *See id.*

TTFCC also claims that “MGI users have an inherent technological advantage that requires GUI and [dial-up] users to employ significant additional resources during number rollouts to have even a fighting chance for numbers during crucial rollout periods.” TTFCC

Comments at 7. TTFCC's claim has no substance. As the Commission has recognized, a Resp Org's choice of interface is an individual business decision. *See Report and Order, Toll Free Service Access Codes*, 11 FCC Rcd 2496, 2501, ¶ 22 (1996). MGI is appropriate for some users but not for others; the question is whether the particular Resp Org's business needs justify the investment in MGI. Again, however, no matter what type of interface a Resp Org chooses, its orders will be processed in the order they are received; this is precisely what the Commission's rules require.

## **II. Issues Pertaining to the Introduction of New Service Codes Are Appropriately Handled Through Industry-Wide Consensus Procedures Under the Auspices of SNAC**

As we explained in our previous comments in this proceeding, the decision to proceed with the 855 roll out on November 18 was reached by industry consensus. Following successful tests of the software revisions to the SMS/800 number reservation system, SNAC reached consensus on November 3, 2000, that the problems experienced during the 866 roll out had been eliminated and that the 855 roll out should proceed as scheduled.

TTFCC now claims that its members received no advance notification of that meeting. *See* TTFCC Comments at 9-10. Yet the November 3 meeting was scheduled in August, at the SNAC meeting during "OBF #71." *See* August 21-25 Minutes at 11 (Attach. 3 hereto). Indeed, the dial in number and the pass code for the conference call meeting are contained in the minutes of that meeting; they also appear in the summary of the 855 code action item on the ATIS web site. *See id.*; Issue Identification Form (Issue 1727) at 8 (Attach. 4 hereto). The specific purpose of that call, as described in both documents, was to conduct a "Go-No-Go" discussion regarding the release of the 855 code on November 18. *See id.* Pursuant to OBF Guidelines, and in accordance with the procedures observed by all other ATIS committees, this call and its subject

were posted on the SNAC website and distributed via e-mail to those Resp Orgs that had subscribed to the SNAC e-mail exploder list. *See* Casey Decl. ¶ 10. All Resp Orgs, therefore, were able to learn of and participate in the November 3 call. *See* Wade Decl. ¶ 8.

Given the widespread notice about the November 3 meeting, it is not surprising that not one of the 14 Resp Orgs that submitted letters in support of the Coalitions' comments states that it was not aware of or able to participate in the meeting. Moreover, as TTFCC acknowledges, the affiant for the TNFC not only received notice of the meeting but was also one of the participants. *See* TTFCC Comments at 11 & Attach. B at 3. Even though she had the opportunity to raise her concerns during that meeting, she instead chose to remain silent while the rest of the meeting participants reached consensus that there was no reason to delay the introduction of the 855 code.

TTFCC claims that her silence at this crucial juncture — when Resp Orgs were attempting to reach consensus on whether the 855 release should proceed as scheduled — should be deemed irrelevant because the rest of the Resp Orgs that chose to participate were MGI users. *See* TTFCC Comments at 10-11.<sup>14</sup> Yet the industry-wide consensus process cannot work if Resp Orgs decline to participate in these meetings or choose not to voice their concerns.<sup>15</sup> Indeed, in this case, the one small Resp Org that participated in the meeting failed to raise any objections to

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<sup>14</sup> TTFCC also implies that SNAC members were indifferent to known problems with the reservation system during the roll out of the 866 code and that such problems have not been corrected. *See* TTFCC Comments at ii-iii, 5, 9. TTFCC fails to acknowledge that SNAC decided to proceed with the 866 roll out because “there is too great of a potential for the current toll free resource to exhaust before the implementation of the new reservation process.” Havens Letter at 2. Further, those problems have been corrected, as reported to SNAC during the November 3 meeting. *See* TTFCC Comments Attach. B at 1

<sup>15</sup> To the extent TTFCC claims that the meeting did not satisfy OBF's requirements for consensus, the BOCs and DSMI note that the OBF Guidelines state that, “[u]nder some circumstances, consensus is achieved when the minority no longer wishes to articulate its objection.” OBF Guidelines at 2.

the 855 roll out and, along with others who chose not to participate, elected instead to file an emergency petition with the Commission. These Resp Orgs thus chose to make an end-run around the consensus-based process that the Commission has looked to in addressing toll free numbering issues.

The Commission should not reward Resp Orgs' failure to pursue their concerns through established channels by undertaking the micro-management of the toll free number reservation system. Indeed, the Coalitions were on notice since May of the planned upgrades to the reservation system<sup>16</sup> and since July of the problems they experienced during the 866 roll out. Yet they point to no evidence that they ever raised the claims they press before the Commission within the SNAC procedures. Had they participated fully in the SNAC procedures, their concerns would have been addressed, and likely resolved to their satisfaction, without recourse to emergency petitions and without imposition of a wholly unnecessary burden on the Commission.

### **III. The Commission Should Authorize the Prompt Introduction of the 855 Code**

As explained above and in our previous comments in this proceeding, the Coalitions' complaints about the toll free number reservation process are wholly speculative and provide no reason for delaying the introduction of the 855 code at all, let alone indefinitely.<sup>17</sup> The Commission therefore should permit the BOCs and DSMI to roll out the 855 code at the next available date established through the SNAC consensus procedures.

Although the Coalitions are correct that exhaustion of toll free numbers is not yet imminent, it would be irresponsible to await near depletion of the resource before authorizing

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<sup>16</sup> See Havens Letter at 1.

<sup>17</sup> See TFNC Comments at 1-2; TTFCC Comments at iii, 3-4, 13.


introduction of a new code. *See* WorldCom Comments at 4. In addition, the Commission's decision to delay the introduction of that code has already imposed costs on Resp Orgs and toll free service subscribers who had planned to reserve and to use numbers in the 855 service code. The delay sought by the Coalitions would put these business plans on hold indefinitely. *See* Sprint Comments at 4. Resp Orgs and subscribers will be able better to plan their business affairs if the Commission promptly removes any obstacle to the 855 roll out. *See* WorldCom Comments at 4.

### CONCLUSION

For the foregoing reasons, the Commission should authorize the prompt introduction of the 855 service code.

Respectfully submitted,

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December 20, 2000



## **866 NPA Code Opening**

### ***Problem Analysis***

#### **Background**

On Saturday, July 29, 2000, the 866 NPA toll free code was opened at 12:01 p.m. During the code opening, the SMS/800 Help Desk recorded complaints from online users stating their terminals were locked and they were unable to do any work. SMS/800 support staff began investigation of the problem, immediately. Initial investigation revealed very low online user volume. No online user transactions, specifically ZM3TN02A and ZM3TN30E (Number Search/Reservation programs), were backed up for processing within IMS. Additionally, traces did indicate online transactions were being received and processed. MGI users were creating a work load volume that had been expected.

#### **Stress Testing 09/06/2000**

In an effort to understand what the online users were experiencing, members of the SMS/800 support staff attempted online searches. These attempts also resulted in several terminal sessions becoming locked. Efforts to break the locks by forcing user ids from the system did not have any impact. At approximately 12:35, online user activity began to jump to levels that had been expected. Initial problem determination ruled out an application problem since the application was receiving and processing the Number Administration transactions; some online users were also able to reserve numbers during this slow period. Additionally, because the IMS queues were only backed up with expected MGI transactions, it appeared as if the IMS software was functioning as expected.

Because it appeared as if online requests for work were not reaching the IMS control regions, we concluded the problem was likely network oriented. However, with the data that was available from the code opening, we were unable to pinpoint where the problem resided. The application SMEs were charged with the responsibility to find the cause of the problem and to provide a resolution prior to the introduction of the 855 NPA toll free code.

In an effort to try to isolate where the problem occurred, a stress test was set up with Resp Org participation on Wednesday, September 6, 2000. Only those Resp Orgs who reported problems during the 866-code opening were asked to participate in the 9-6-00 test. The test appeared to recreate the problem. Network traces indicated that the terminals that were going into a response/input mode ("locked") had successfully traversed the network. In other words, their data had been successfully handed off to the IMS. Further log analysis of the terminals that were "non-responsive" indicated successful processing of the Number Administration transaction resulting in message switches. Continued analysis of system logs from July 29, 2000 indicated successful processing of the response mode Number Administration transactions which, in turn, sends messages back to the online user. Because it is a response oriented transaction, the online user's terminal enters a "locked" state until these messages are received from SMS/800.



The messages were required to traverse the Multi-System Coupling link (MSC link) between the 866 system and the 800 system. The network link did experience a backup; the original backup was initially thought to be MGI traffic (non-response type messages) moving from the 866 to the 800 system. In reality, however, the link was congested with messages from MGI processing as well as messages from online user *activity* (response messages from the Number Administration transactions back to associated online user). As the MSC links dequeued and the online user messages were received back at the original terminal destinations, user terminals became "unlocked". The original backlog of messages queued on the MSC links cleared between 12:35-12:40 PM (CDT).

In addressing the online user "lockup" situation, a bottleneck that occurred within the internal SMS/800 network has been identified. Specifically, the MSC link appears to have backed up both online and MGI messages (messages created from online and MGI transactions). Only online users were negatively impacted by this backup. This is because the online number search/reservation program requires a positive response back to the online user before their terminals are "unlocked" and readied for further input.

Once the MSC links caught up from the original influx of traffic (MSC link cleared between 12:35-12:40), all users were able to input number search/reservations as expected.

## **Resolution**

The "lockup" situation experienced by online users, caused by MSC link congestion, should not occur with 855-code opening. The 855-code will be opened with the SMS/800 software release 11.2.x. The premise for the 11.2.x release (also known as the FIFO release) is that all users will utilize the same number administration search/reserve software that is "non-response" oriented. As such, backups that are experienced on the MSC links will not adversely affect user (MGI, online, or GUI) response time.

To fully test both the new 11.2.x software as well as to verify the conclusions reached will not be present for the 855 NPA toll free code opening the SMS/800 SME's will be performing an internal stress test on October 5, 2000. In addition, the SMS/800 support staff is requesting Resp Org participation in performing two industry stress tests, the first will be held on Thursday, October 12, 2000 from 2:00 PM (CDT) until approximately 3:00 PM (CDT) and again on Tuesday, October 17, 2000 from 2:00 PM (CDT) until approximately 3:00 PM (CDT). There has been a conference call established during the test window on Tuesday, October 17, 2000 for all interested Resp Orgs to participate in. The number for the Tuesday, October 17, 2000 call is 800-203-0730 PIN 9437.

The Primary Contacts for the Resp Orgs who participated in the September 6, 2000 stress test have been asked via telephone and/or email contact to participate in a conference call to discuss the results and findings of the September 6, 2000 stress test. SMS/800 support staff will be available for questions during this call. This conference call will be held on Wednesday, October 4, 2000 at 3:00 PM (CDT) and will last approximately one hour. To participate in this call please dial: 800-204-4427, PIN 9663.

***Notes from 10-4-00 Conference Call with Participants:***

**Attendees:**

Kris Vollmer - Sykes

Howard Grove - Verizon

Jon Seabugh - SBC

Chris Rugh – WorldWide Telecom

Keith Mayhew

Ted Fernandez - Qwest

Jeff Hendrix & Karen – AT&T Canada

Lois Writeman - ATL

Regina Rowland - SBC

Ron Pollard - SBC

Anil Patel - DSMI

Mary Stepney - Verizon

Vasanthan Ananthakrishnan - Telcordia

Jennifer Roberts – Viatel

Ellen Oteo – Verizon

- Angela - Excel

Ron reviewed the above document and the findings. Reviewed what the 11.2.x release will mean.



## **Declaration of Joseph P. Casey**

1. I, Joseph P. Casey, am Vice President of Database Service Management, Inc. (DSMI). I am familiar with the declaration filed by Michael J. Wade, President of DSMI, in this matter on November 16, 2000 (referred to hereinafter as "Wade Decl.") in response to the petitions for emergency relief filed by the Toll Free Number Coalition ("TFNC") and The Toll Free Commerce Coalition ("TTFCC"). The purpose of this declaration is to provide additional evidence pertaining to the roll out of the 866 toll free access code, the operation of the SMS/800, and the testing process that culminated in the industry's decision to proceed with the roll out of the 855 code.

2. Following the roll out of the 866 service code, the SMS/800 Site Support organization identified about 35 Responsible Organizations ("Resp Orgs") that had reported problems during that roll out. See Wade Decl. ¶ 5. Those Resp Orgs were contacted by the SMS/800 Help Desk and invited to participate in a system test on September 6, 2000, in an attempt to duplicate, and thereby identify the cause of, the problems they reported experiencing. See *id.* Included among those Resp Orgs were nine of the Resp Orgs that have submitted letters in support of the TNFC's and TTFCC's comments: Iowa Communications Network, Telecom Affiliates, Inc., ABCO Communications, Inc., BTi, Selective Media, PointOne Telecommunications, Premiere Network Services, Inc., Atlantic Connections, and International Telecom, Ltd. Despite being invited to participate in the September 6 test, not one of these nine Resp Orgs did so.

3. Resp Orgs that participated in the September 6 test were invited, via e-mail, to participate in a conference call, on October 4, to discuss the results of that test. See Wade Decl. ¶ 5. Attached to the e-mailed invitation to the October 4 call was a two-page document summarizing the results of the September 6 test. That document explained that the delays these Resp Orgs had reported during the 866 roll out were replicated during the September 6 test and were attributable to the GUI and dial-up interfaces entering "response mode" after a Resp Org submitted a request. The high volume of orders submitted at the outset of a code release created a bottleneck in the SMS/800 and prevented it from returning responses to requests rapidly. Although MGI users did not receive responses any faster than users of the GUI or dial-up interfaces, only the latter two interfaces were affected by the delay in returning responses, because only they went into "response mode." See *id.* ¶ 6.

4. Among those Resp Orgs invited to the October 4 conference call was one of the Resp Orgs that has submitted a letter in support of the TNFC's and TTFCC's comments. Broadwing Communications' contact person, Stephanie Cosper, is listed as a recipient of an e-mailed invitation to the October 4 call. Broadwing, however, chose not to participate in the call. DSMI's records also do not list Broadwing among those Resp Orgs that complained by telephone during the 866 roll out. Those records, however, do not reveal whether Broadwing was invited to, or participated in, the September 6 test.

5. Further, records from the SMS/800 reveal that the other four Resp Orgs that have submitted letters in support of the TNFC's and TTFCC's comments — RSL COM USA, XO Communications, Questar InfoComm, Inc., and Baystar — did not submit a single number request during the 866 roll out. Those records further reveal that only one of those four Resp Orgs, RSL COM USA, even logged into the SMS/800 during the 866 roll out. None of these four Resp Orgs were among those that complained by telephone during the 866 roll out.

6. Tests of version 11.2.3 of the SMS/800 software occurred on October 12 and 17. See Wade Decl. ¶ 7. All Resp Orgs were informed of both tests on September 15 and again on September 28.

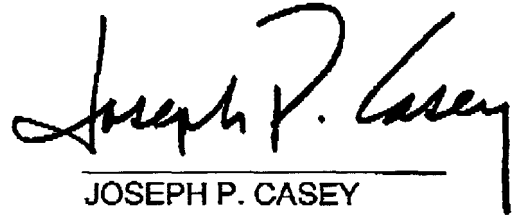
7. The system test conducted on October 12, 2000 attempted to simulate the 855 code opening. Ten on-line Resp Orgs participated in this test. Vendor groups also sent orders over the dial-up interface using scripts. The SMS/800 Site Support group submitted simulated orders by 20 GUI users as well as 65,000 MGI orders. During the hour-long test, a total of 100,000 numbers were reserved. The participating on-line Resp Orgs did not experience any problems during this test.

8. At the request of the industry, the system test conducted on October 17, 2000 was an industry-only test. Thirteen Resp Orgs participated in the test, representing both on-line and MGI users. During the hour-long test, these Resp Orgs submitted a total of 19,150 successful number reservation requests, of which 13,500 were submitted by MGI users. As with the October 12 test, none of the Resp Orgs experienced any problems in submitting requests over their interfaces.

9. With the changes implemented in version 11.2.3 of the SMS/800 software, users may submit a maximum of 10 requests in a single transaction over all three interfaces. See Wade Decl. ¶ 10. Thus, MGI users cannot submit more requests in a single transaction than can GUI or dial-up users. The 10 requests per transaction limit is not based on any technological limitations of the software. Instead, the limit was set by consensus within SNAC. Any proposals to change this limit could and should be made to SNAC.

10. The November 3, 2000 conference call, during which SNAC reached consensus that the problems experienced during the 866 roll out had been eliminated and that the 855 roll out should proceed on November 18, 2000, see Wade Decl. ¶ 8, was first scheduled in August 2000. Details about the conference call were posted on the SNAC web site and distributed via e-mail through the SNAC e-mail exploder list to those Resp Orgs that had signed up for that list. The call was open to all Resp Orgs. See *id.*

I declare under penalty of perjury that the foregoing is true and correct.

  
JOSEPH P. CASEY

DATED: December 20, 2000



**OBF 71**  
**SMS/800 NUMBER ADMINISTRATION COMMITTEE (SNAC)**  
**August 21 - 25, 2000**

**I. WELCOME/CALL TO ORDER**

Matt Peacock, Bell Canada, and Pat Parker, Verizon, (SNAC Co-Leaders) welcomed participants to OBF #71. The participants introduced themselves and a list is attached. **(Attachment 1)**

**II. REVIEW OF LEADERS/ADMINISTRATORS MEETING**

Matt Peacock reviewed the highlights of the Leaders and Administrators meeting with the participants. **(Attachment 2)**

**III. REVIEW AND APPROVAL OF OBF 71 AGENDA**

The draft agenda was approved as written. **(Attachment 3)**

**Point Noted:**

1. It was noted that a 2-hour lunch meeting is scheduled for Wednesday, August 24 for Committee and Task Force Co-Leaders and the OBF moderators.

**IV. NOMINATION OF SNAC CO-LEAD**

**Point Noted:**

2. It was noted that Leslee Strohm, Qwest was nominated for SNAC Co-Lead to replace Matt Peacock, who has resigned as Co-Lead, due to a change in job responsibilities. Ron Havens noted that Leslee Strohm has indicated a willingness and company support to take on the role of SNAC Co-Lead. No other nominations were received from the floor and Leslee was elected by acclamation as the incoming SNAC Co-Lead.

**IV. REVIEW OF CORRESPONDENCE**



Sprint noted that it is in support of the statement made by AT&T.

Consensus was **not** reached.

**Points Noted:**

54. A participant noted that in order to form a task force, the SMT should provide information regarding the slowdown of online reservation requests. No volunteers stepped forward to form a task force.
55. A participant noted that he disagrees with the delay of the code opening of 855 ERC, as previously suggested, because all venues have been explored to determine and resolve the problem of the slowdown processing for online users.
56. It was noted that the message queues were not locked up and that everything in the applications from the SMS side worked properly.
57. It was suggested to work the project plan for the code release of 855 ERC. It was noted that November 10, 2000 will be the Go-No-Go date for the release of the 855 ERC.
58. In response to a question whether Concept #2A would be impacted in case of a no-go decision by the SNAC for the 855 ERC, it was noted that two separate Go-No-Go dates are being proposed:
  - Go-No-Go for the release of 855 ERC
  - Go-No-Go for Concept #2A implementation
59. Participants worked on and revised the project plan for Issue #1727.  
**(Attachment 7)**

**Agreements Reached:**

7. The SNAC reached consensus to accept the revised project plan and incorporate the project plan in the Issue 1727.
8. The SNAC agreed to schedule a conference call on November 3, 2000 to discuss the Go-No-Go of 855 ERC and implementation of Concept #2A.

**Action Item:**

3. The SNAC is scheduling a conference call on November 3, 2000, 1:00 p.m. EDT to discuss the Go-No-Go of 855 ERC and Concept #2A. The information for the call is as follows:  
Dial In: (334) 240-1633  
Participant Code: 128750  
Trouble Reporting Number (800) 526-6020 and provide the Host Code Number (556026)



# Ordering and Billing Forum Issue Identification Form

OBF Issue Number 1727 (formerly 1620)		
Date Submitted	12/3/97	
Date Accepted	12/3/97	at OBF #60.1
Initial Closure	2/7/00	at OBF #69
Final Closure		at OBF #72
Issue Category	Final Closure	

Page 1

Issue 1620: 855 Implementation

**Issue Statement:** Begin coordinating SNAC activities in order to implement 855 SAC so that there are no further exhaust emergencies.

**Impact of Other Issues or Procedures:**

**Desired Results:** Open 855 SAC by September 26, 1999 12:01 a.m.

**Committee Assignment:** SMS/800 Number Administration Committee (SNAC)

**Associated Committee:**

**Type of Issue:**

MGI		User Documentation		Other	
Hardware		Bill/800 System		SCP / Interface	
Software		SMS/800	X	On-Line	

NASC Procedures					
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**Associated MR #:**

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**Issue Champion:** Judy Cook

**Company:** Sprint

**Address:** 1200 Main  
Kansas City, MO 64105

**Telephone:** 816-854-3425

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**Resolution:**

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**Status History:**

12-3-97 It was agreed to accept the issue.

**2/6/98 OBF #61**

**Action Item:**

47. Participants will investigate the feasibility of opening NPA codes 855 and 866 on the same day.

**Agreement Reached:**

48. It was agreed that Issue 1620: 855 Implementation will be worked in conjunction with Issue 1603: 866 Implementation. Both issues will remain in active status pending ongoing development and assigned action items.

4-23-98 OBF #62 Please see Issue 1603: 866 Implementation for status history.

8-26-98 OBF #63 Please see Issue 1720 (formerly Issue 1603): 866 Implementation for status history.

11-06-98 OBF #64 Please see Issue 1720 (formerly Issue 1603): 866 Implementation for status history.

- 12-15-98 SNAC Conference Call Please see Issue 1720 (formerly Issue 1603): 866 Implementation for status history.
- 02-08-99 OBF #65 Please see Issue 1720: 866 Implementation for status history.
- 04-6/7-99 April 6-7, 1999 Full SNAC Interim meeting. Please see Issue 1720: 866 Implementation for status history.
- 08/9-11/99 OBF #67 Please see Issue 1720: 866 Implementation for status history.
- 11/15-18/99 OBF #68 Please see Issue 1720: 866 Implementation for status history.
- 2/7-10/00 OBF #69 Please see Issue 1720: 866 Implementation for status history.

### **OBF #70, Albuquerque, NM May 22-26, 2000**

#### **Action Item:**

11. Megan Campbell will research the industry groups that were notified of the code opening for 877.

#### **Agreements Reached:**

14. The SNAC reached consensus not to implement the 855 code until at a minimum, Concept #2A with 3 options has been implemented.

AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need if exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).

WorldCom objected and stated they want to see all 4 options implemented prior to the 855 code opening.

15. The Committee reached consensus not to implement the 855 code until Concept #2A with 4 options has been implemented. Consensus has been reached.

AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need if exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).

**Agreement Reached:**

16. The SNAC came to consensus that Concept #2A with 4 functional changes will be implemented on November 4, 2000 and release 12.0 will be implemented on January 13, 2001. Consensus has been reached.

AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need if exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).

**Agreement Reached:**

17. The SNAC reached consensus to ask the SMT to incorporate the >32k records on SCP tape load in the 12.0 release to be implemented on January 13, 2001. Consensus has been reached.
18. The SNAC reached consensus on the code opening date for 855 on November 18, 2000.  
  
AT&T objected to the implementation of code 866 on July 29, 2000 because the first-come, first-served reservation fix would not be available to SMS/800 users. Since the Industry has determined to move forward with 866 without the prescribed fix in place, then AT&T objects to holding 855 for the fix at a later date because of the negative impact to customer expectations. AT&T believes that the proposal presented on the May 12 conference call and associated contingency plan would meet the need if exhaust should ever occur. Further, the contingency fall back date as described (August 21, 2000) was only 2 weeks away from the agreed upon 866 implementation date (July 29, 2000).  
  
Additionally, AT&T believes that it is irresponsible to implement the 855 code on November 18, 2000 when the Release 12.0 is scheduled for implementation January 2001. This release contains features, which would improve system performance.

**Agreement Reached:**

19. The SNAC agreed to keep Issue #1720 in initial closure pending the letter to the FCC.

**Agreement Reached:**

126. The SNAC agreed to incorporate a suggested date by which the FCC should respond to the SNAC recommended dates by ordering DSMI to turn on the codes.

**Agreements Reached:**

20. The SNAC reached consensus to a 60-day reservation period per code opening.
21. The SNAC reached consensus to request a response from the FCC by June 16, 2000.
22. The SNAC reached consensus to request expedited approval by the CLC and ATIS legal and after such approval is given to immediately forward the letter to the FCC.

**Agreement Reached:**

23. The SNAC reached consensus to wait until the letter has been sent to the FCC informing them of the code opening dates before a CSB is sent to the industry.

**Action Items:**

12. Heike Martin will inform Anil Patel when the letter has been delivered to the FCC.
13. Matt Peacock will ask ATIS Legal to draft and mail letters to USTA, IAPP and ALTS informing them of code opening consensus dates.
14. ATIS will provide the bridge for the code opening on July 29, 2000 starting 11:50 a.m. Central time for 2 hours.

**Agreements Reached:**

24. The SNAC reached consensus to amend the agenda and move forward with Issue #2060. (See page 43)
25. The SNAC came to consensus to leave Issues #1720 and #1727 in initial closure.

**Full SNAC Conference Call - July 6, 2000**

**RE: FCC Response Regarding SNAC Request for Extended Reservation Period**

**Agreement Reached:**

1. The SNAC reached consensus to keep the reservation interval for the code opening of 866/855 at 45 days and not pursue with a compelling justification to the FCC to extend the reservation period from 45 to 60 days.



**Agreement Reached:**

2. The SNAC reached consensus to schedule a conference call to discuss the section of *Toll Free Administrative System Structure* of the FCC order (FCC 00-237).

**Action Items:**

1. The SNAC will discuss the *Toll Free Administrative System Structure* of the FCC order (FCC 00-237) on a conference call scheduled for Thursday, July 13, 2000 at 3:00 p.m. EDT.
2. Jon Durst, WorldCom will provide the bridge and pin number for the call.
3. Heike Martin will post the information, upon receipt from Jon Durst, to the OBF calendar page and inform the SNAC of the posting via an Exploder message.

**OBF #71 - August 21-25, 2000**

**Agreement Reached:**

6. The SNAC reached consensus to perform testing for the 855 ERC code opening on October 17, 2000, 2:00 p.m. CDT. A CSB will be sent by September 5, 2000 to inform of the testing and to provide a conference bridge. A reminder CSB will be sent by October 3, 2000.

**Action Item:**

2. The SMS Help Desk will send a CSB by September 5, 2000 to inform of the testing and to provide a conference bridge. A reminder CSB will be sent by October 3, 2000.

**Status:**

**Agreements Reached:**

7. The SNAC reached consensus to accept the revised project plan and incorporate the project plan in the Issue 1727.
8. The SNAC agreed to schedule a conference call on November 3, 2000 to discuss the Go-No-Go of 855 ERC and implementation of Concept #2A.

**Action Item:**

3. The SNAC is scheduling a conference call on November 3, 2000, 1:00 p.m. EDT to discuss the Go-No-Go of 855 ERC and Concept #2A. The information for the call is as follows:

Dial In: (334) 240-1633

Participant Code: 128750

Trouble Reporting Number (800) 526-6020 and provide the Host Code Number (556026)

**Status:**

**Agreement Reached:**

9. The SNAC agreed to incorporate a chart for proposed dates of new codes and implementation dates of existing codes in the Industry Guidelines for Toll Free Number Administration.

**Action Items:**

4. Jonnie Bond will forward a chart for proposed dates of new codes and implementation dates of existing codes in the Industry Guidelines for Toll Free Number Administration to the Committee Administrator.

**Status:**

5. The Committee Administrator will incorporate the chart in the Industry Guidelines for Toll Free Number Administration.

**Status:**

**Agreement Reached:**

10. The SNAC reached consensus to keep Issue 1727 in initial closure.

**OBF #72 – November 6-10, 2000**

**Point Noted:**

46. It was noted that 855 ERC will open on November 18, 2000, 12:01 p.m. CT.

**Agreement Reached:**

7. The SNAC agreed to move Issue 1727 into final closure.



## CERTIFICATE OF SERVICE

I, Sylena Slaughter, hereby certify that on this 20th day of December, 2000, copies of Reply Comments of the Bell Operating Companies and DSMI were served upon the parties listed below by hand delivery or by United States, first-call mail, postage prepaid.

\* Dorothy Attwood  
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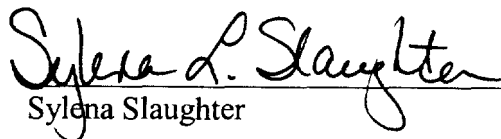
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Sylena Slaughter

\* Hand Delivery